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## Privacy & Data Policy

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## Our Commitment To Privacy

At Uphold, we understand how important privacy is to our members and partners. That's why we are committed to maintaining the confidentiality, integrity, and security of all personal information. We collect only what we need in order to provide a secure service, and we don't share your personal information with any third parties except to ensure the safety, quality and certain aspects of our service, compliance with laws and regulations, and the security of you, our members and our partners. When we do share your information with third parties, we work to ensure that they only use it for the contracted purposes and that they keep it secure. Within Uphold, access to your personal information is limited to those people who need it to do their jobs, consisting generally of our legal,

compliance, product and identity verification professionals.

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### **Protecting Your Personal Information is Our Default Mode**

Unless disclosure is required by rare circumstances, we work hard to keep your personal information private.

### **We Keep Your Personal Information Safe**

There is no way to eliminate all risk, but we are dedicated to keeping your personal information safe.

### **Real-time Transparency and Personal Privacy are Compatible**

Our real-time public transparency and proof of solvency do not reveal your personal information.

## **UPHOLD PRIVACY & DATA POLICY**

**Last updated on October 14, 2015.**

### **1. PURPOSE OF THIS PRIVACY & DATA POLICY**

Uphold HQ, Inc., a company incorporated under the laws of South Carolina, Uphold Worldwide Ltd., incorporated under the laws of Antigua, W.I. and related companies and affiliates have created the following Privacy & Data Policy to let you know what information we collect when you visit our websites, use our products, services, or apps (our “Service”), or access and/or use third-party services that use our Application Programming Interface (“API”), why we collect such information, and how it may be used.

We may periodically post changes to this Privacy and Data Policy on this page, and trust you will review the content regularly. We may also notify you of changes by email or through other communication channels.

### **2. HOW WE COLLECT INFORMATION ABOUT YOU**

2.1 We collect information from and about you when you register or use our Service. When registering you may be asked for detailed information including your name, email address, physical mailing address, phone number, government issued identification documents, or other information. We may also request and receive information about you from other sources or use other sources to confirm the

information that you provide us.

2.2 When you visit our site and/or use our Service, we automatically collect information sent to us by your computer, mobile phone, or other device. This information may include your IP address, device information (including, but not limited to, identifier, name and type, operating system, mobile network information), standard web log information, such as your browser type, and the pages you access on our site.

2.3 When you use a location-enabled device with our Service, we may collect geographical location data or use various means to determine your location, such as sensor data from your device that may, for instance, provide data on nearby cell towers and Wi-Fi access spots.

2.4 We may log information using “cookies.” Cookies are small data files stored on your hard drive by a website. Cookies help us make our site and Service and your use of them better by allowing us to recognize your browser and capture and remember certain information. Please see our [Cookie Policy](#) for additional information.

### **3. REGARDING CHILDREN'S PRIVACY**

You must be at least 18 years old, or at least 13 years old under the direct supervision of your parent or guardian, to use the Service. We do not knowingly solicit or collect information from individuals under 13. If we become aware that a child under the age of 13 has provided us with personal information, we will delete that information.

### **4. HOW WE USE YOUR PERSONAL INFORMATION**

4.1 We use your personal information to: (i) operate, maintain, and improve our Service; (ii) respond to comments and questions and provide support to our Members; (iii) send information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages; (iv) communicate about promotions, upcoming events, and other news about products and services offered by us or any affiliates; (v) link or combine member information with other personal information; (vi) protect, investigate, and deter against fraudulent, unauthorized, or illegal activity; and (vii) provide and deliver the Service.

4.2 If you register for or use Service, we, or our affiliates, partners and/or vendors acting on our behalf, may collect the following types of information:

- Contact information: your name, address, phone, email, Skype ID and other similar information;
- Identity Verification Information: We may require you to provide additional information that we may use and provide to partners and or vendors acting on our behalf to verify your identity. This information may include your date of birth, taxpayer or government identification number, a copy of your government-issued identification, or other personal information. We may also obtain information about you from third parties such as credit bureaus and identity verification services;

- Ongoing Information Collection: When you use our Service, we collect information about your transactions and/or your other activities on our site or Service and we may continuously collect information about your computer, mobile device, or other access device to protect the Service, members and us, for fraud prevention and remediation purposes, to monitor for irregular activity with your account, and to identify known malicious software or other activity that may harm us or our members;
- Social Media-Related Information: You may choose to provide us with access to certain personal information stored by third parties such as social media sites (like Facebook, Google, Twitter, etc). The information we have access to varies by site and is controlled by you. If you associate an account managed by a third party with your Uphold account you authorize us to have access to and use this information; and
- If you authorize applications or third party integrations on or using our Service, these parties may receive detailed information about your account, your use of the Service, transaction history or even the ability to take actions on your behalf. Information collected by these applications or third-party integrations are subject to their terms and policies.

4.3 We may also collect additional information you may disclose to our member support team in order to resolve problems you report.

## **5. HOW WE SAFEGUARD YOUR PERSONAL INFORMATION**

5.1 We use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been anonymized so that it does not identify a specific user. We take carefully considered and periodically reviewed measures, as described herein, to protect your personal information.

5.2 We store and process your personal and transactional information on our servers in the United States and elsewhere in the world where we, our affiliates, our partners, providers or vendors are located, and we protect that information by maintaining physical, electronic, and procedural safeguards, incorporating tested security technologies, in compliance with applicable laws. We may use network safeguards such as firewalls and data encryption, enforce physical access controls, and authorize access to personal information only for those people who require access to fulfill their job responsibilities. Those with access to your personal information are carefully screened, periodically reevaluated, and are required to keep all member personal information confidential. Security risks exist and no organization can genuinely promise you otherwise. Bad actors may defeat even the most carefully considered and implemented safeguards.

5.3 We store personal information securely and will retain that information for as long as necessary to maintain the Service, comply with our legal obligations and/or resolve disputes.

## 6. WHAT UPHOLD'S REAL-TIME PUBLIC TRANSPARENCY REVEALS ABOUT YOUR TRANSACTIONS:

6.1 We publish a real-time accounting of all movements of value into, within, and out of our system via our Reservechain™. The Reservechain™ does not contain any personal information. However, the amount, asset class, and time-stamp of all transactions conducted using our Service is publicly available on the Reservechain™ and that information is a permanent part of the publicly-accessible Reservechain™. The Reservechain™ does not contain information that is directly attributable to any Members who are not a party to the transaction. Only members who are party to the transaction have the ability to access personally identifiable information associated with their transactions.

6.2 We publish a real-time accounting of all movements of our financial obligations to our members, our solvency as well as a real-time accounting of all movements of value in the reserve of assets that substantiates the value of assets enabled by our system. This Reserveledger™ contains no personal information. However, the amount, asset class, and time-stamp of all transactions conducted using our Service are publicly reported on the Reserveledger™ and that information is a permanent part of the publicly-accessible Reserveledger™. The Reserveledger™ does not contain information that is directly attributable to any members who are not a part of a given transaction. Only members who are party to the transaction have the ability to access personally identifiable information associated with their transactions..

## 7. SHARING YOUR PERSONAL INFORMATION

7.1 We do not sell, trade, or otherwise transfer to outside parties your personal information. This does not include third parties who assist us in operating our Service, conducting our business, or supporting our members, so long as those parties agree to keep this information confidential and secure and on the same conditions and protection levels we provide to you as a member. Our agreements with third parties that have access to your personal information generally oblige them to keep your personal information secure and to delete your personal information when access is no longer required. We periodically review the security and confidentiality practices of third parties who we entrust with your personal information. We may also release your information to certified and authorized law enforcement officials when we believe release is appropriate to comply with the law, enforce our terms or policies, or protect the rights, property, or safety of Uphold, our members, or others. We have a set of guidelines for how we engage with law enforcement officials that is available to the public [here](#).

7.2 We may share your personal information as follows:

- With your consent;
- To comply with applicable laws;
- To respond to governmental requests and legal process;
- To protect our rights, the rights of our affiliates, partners or vendors, the rights of other members,

or others. This includes, without limitation, disclosures we may need to make to enforce our agreements, terms and policies;

- In an emergency. This includes protecting the safety of our employees and agents, our members, or others;
- To certain employees, affiliates and vendors when necessary for their roles; and
- If applicable, with entities that we may merge with or be acquired by. (Should such a combination occur, we will require that the new combined entity follow this Policy with respect to your personal information and will provide you with notice of any material changes).

## **8. MARKETING COMMUNICATIONS**

Our marketing emails and other electronic communications tell you how to “opt-out” of receiving more of the same. If you opt-out, we may still send you non-marketing emails and other electronic communications. Non-marketing emails or other electronic communications include emails about your account, transactions, and other aspects of our site or Service. You may send requests about your personal information to our support teams below where you can request to change contact choices, opt-out of our sharing with others, and update your personal information.

## **9. CONTACT INFORMATION**

If there are any questions regarding this Privacy & Data Policy you may contact us using the information below.

Contact us online.

Addresses:

**Uphold HQ, Inc.**

1703 Laurel Street

Columbia, SC 29201

United States of America

**Uphold Worldwide Ltd.**

Unit #3B,

Bryson's Commercial Complex, Friars Hill Road,

St. John's,

Antigua, W.I.

